

Writer's Direct: (213) 486-8046
Writer's Email: rkim@hptylaw.com

April 25, 2014

VIA U.S. MAIL & ELECTRONIC MAIL

U.S. EPA, Region 10
Attn: FOIA Coordinator
Office of External Affairs
1200 6th Avenue (CEC-142)
Seattle, WA 98101
Email: r10.foia@epa.gov

Re: Freedom of Information Act Request
George White and Johnnie White v. Ace Hardware Corp., et al.
Los Angeles County Superior Court Case No. BC520437
Our Client: ArvinMeritor, Inc.

Dear FOIA Coordinator:

We are requesting the disclosure of the following records pursuant to the Freedom of Information Act (Public Law 89-554, 80 Stat. 383; Amended 1996, 2002, 2007), within the next ten business days. All requested records pertain to the following location:

- **Boeing Company located at 20403 68th Ave. S, Kent, WA 98032-2316 from 1975-2009. (The subject property includes nine buildings (18-01, 18-03, 18-04, 18-05, 18-06, 18-11, 18-16, 18-20, and 18-22) and four former buildings (18-21, 18-23, 18-32, and 18-33) located in the western portion of the Boeing Space Center)**

(1) Any records or documents¹ pertaining to the practices, maintenance, and safety procedures of the work performed at the location above, which in any way involved asbestos.

¹ The term "record" and the term "document" are used in the broadest sense possible and mean the original and any non-identical copy (e.g., any copy which is different from the original in any way) of any written, recorded, printed, typewritten, or handwritten matter of any kind or nature (however produced, reproduced, or recorded), including but without limitation, all blueprints, work specifications, daily reports, time cards, letters, telegrams, e-mail, facsimiles, memoranda, reports (preliminary and final), studies, samples, testing protocols, diaries, logs, maps, pamphlets, notes, charts, graphs, calendars, schedules, tabulations, analysis, statistical information, accumulations, books, magazines, telephone bills, minutes, summaries, or other records of meetings, conversations, and hearings of any kind, photographs, slides, videotapes, film impressions, data, data compilations, computer files, computer documents, audiotape recordings, magnetic tapes, sound or mechanical reproductions, computer printouts, contracts, drafts of contracts, leases, subleases, instruments, agreements, warnings, directives, instructions, citations, violations, drawings, hearing transcripts, reports, summaries of investigations or negotiations, opinions or reports of consultations, consultants, or proposed experts, and press releases, now or at any time in the your possession, custody, or control or known or believed by the you to exist or have existed. "Record" or "document" also includes any underlying documents used to create summaries or other reports of financial or other data.

(2) Any records or documents identifying any and all persons, contractors, or other entities who is involved in the practices, maintenance, and safety procedures of the work performed at the location above, which in any way involved asbestos.

(3) Any records or documents pertaining to any asbestos cleanup work or industrial chemical cleanup work performed at the location above.

(4) Any records or documents regarding research, investigations, air testing, reports and/or study data from air testing and air sampling which measured the amount of asbestos fiber either in the ambient air and/or released when asbestos was used, machined, operated, or otherwise disturbed at the location above.

(5) Any records, documents, or letters to or from the Occupational Safety & Health Administration pertaining to warnings, citations, or violations at the location above, which in any way involved asbestos.

(6) Any records or documents, including but not limited to reports, studies, and/or secondary research provided by the Occupational Safety & Health Administration, which addressed the issue of health hazards created by or associated with exposure to asbestos at the location above.

(7) Any written communication from the Occupational Safety & Health Administration to The Boeing Company, which in any way involved asbestos, at the location above.

FOIA allows you to segregate material that is exempt from material that is not exempt. If you determine that some portion of the requested documents is exempt, please provide me with the remainder of the documents. If you determine that some of the documents are exempt from release, please justify withholding of those records by demonstrating that the records are exempt or that the public interest in confidentiality outweighs the public interest in disclosure. We reserve the right to appeal any such determination.

We agree to pay the reasonable costs involved in retrieving and copying the records requested. If there is a charge for this information, please advise if the charge exceeds \$50.00.

If you have any questions, please feel free to contact Raymond Kim at (213) 486-8046 or by e-mail at rkim@hptvlaw.com.

Sincerely,

HAWKINS PARNELL
THACKSTON & YOUNG^{LLP}



Raymond Kim
Paralegal

MBG/rk